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Natalia Vasquez.

October 8, 2019

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Air & Radiation Division

Director, Air Protection Division
EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Subject: JKLM Energy LLC
Reese Hollow 115 Well Pad
Initial NSPS Subpart OOOOa Annual Report

Enclosed please find the above referenced Initial NSPS Subpart OOOOa Annual Report, this is being submitted again to include the signature on the certification statement which was omitted from the initial submission in July 2019.

If you have any questions regarding this submission, please feel free to contact me at 724-935-9815 or jharrick@emslp.com.

Sincerely,

Joseph M. Harrick
General Manager, Environmental Health & Safety
JKLM Energy, LLC

Enclosure

July 18, 2019



CERTIFIED MAIL 7016 1370 0001 7137 7409

Director, Air Protection Division
EPA Region III
Mail Code 3AP00
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: JKLM Energy, LLC.
Reese Hollow 115 Well Pad
Initial NSPS Subpart OOOOa Annual Report

JKLM Energy, LLC. (JKLM) is hereby submitting the enclosed Initial NSPS Subpart OOOOa Annual Report for Reese Hollow 115 well site in Eulalia Township, Potter County, Pennsylvania, in accordance with 40 Code of Federal Regulations (CFR) §60.5420a(b). The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to 40 CFR §60.5410a. The initial startup for Reese Hollow 115 was April 23, 2018; therefore, the initial compliance period was from April 23, 2018, through April 23, 2019. This initial report is being submitted by July 22, 2019, which is 90 days after the end of the initial compliance period. Subsequent annual reports will be due no later than the same date each year as the initial annual report.

This Initial Annual Report include applicable information of the items required under 40 CFR §60.5420a(b).

- General Information
- Well Information
- Centrifugal Compressor Information
- Reciprocating Compressor Information
- Pneumatic Controller Information
- Storage Vessel Information
- Fugitive Emissions Components Information
- Pneumatic Pump Information
- Performance Test Information
- Combustion Control Device Information
- Closed Vent System Certification



July 18, 2019

If you have any questions or comments about the attached information, please feel free to contact me at 724-935-9815 or jharrick@emslp.com or Leah Blinn at 412-249-1607 or lblinn@cecinc.com, and we will provide any clarification or additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph M. Harrick", written in a cursive style.

Joseph M. Harrick
General Manager, Environmental Safety and Health

Cc: Commonwealth of Pennsylvania, Department of Environmental Protection

**REESE HOLLOW 115 (RH 115) WELL PAD
INITIAL NSPS SUBPART OOOOa ANNUAL REPORT**

Submitted By:

**JKLM ENERGY, LLC
2200 GEORGETOWN DRIVE, SUITE 500
SEWICKLEY, PA 15143**

Prepared By:

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
PITTSBURGH, PA**

CEC Project 190-045

JULY 2019



Civil & Environmental Consultants, Inc.

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LIST OF ATTACHMENTS

Attachment A	Certification Statement
Attachment B	Well Completion Operation Logs

1.0 GENERAL INFORMATION

[40 CFR 60.5420a(b)(1)]

Requirement	Response
Company Name [(b)(1)(i)]	JKLM Energy, LLC
Facility Site Name [(b)(1)(i)]	Reese Hollow 115
US Well ID [(b)(1)(i)]	37-105-21869 37-105-21870 37-105-21871 37-105-21872 37-105-21873 37-105-21874
Location [(b)(1)(i)]	See Site Location Description and Latitude/Longitude Coordinates below.
<ul style="list-style-type: none"> Address <p><i>If address not available:</i></p> <ul style="list-style-type: none"> Site Location Description 	<p>From Coudersport, PA, head east on East 2nd Street for about 1.9 miles. Then turn left onto North Hollow Road (State Route 4013). Continue for 2.3 miles, then turn left on Burrows Road. Continue for 1.1 miles, then turn left onto the facility access road. Continue for 1.8 miles and stay right at the fork in the road. The facility will be ahead in 0.2 miles.</p>
<ul style="list-style-type: none"> Lat/Long Coordinates (NAD 1983) 	41.798042, -77.976973
Identification of each affected facility included in report [(b)(1)(ii)]	Well: Reese Hollow 115-1HU; Well: Reese Hollow 115-2HU; Well: Reese Hollow 115-3HU; Well: Reese Hollow 115-4HU; Well: Reese Hollow 115-5HU; Well: Reese Hollow 115-6HU; and Fugitive Components at the Well Site
Reporting Period [(b)(1)(iii)]	
<ul style="list-style-type: none"> Beginning Date End Date 	<p>April 23, 2018</p> <p>April 23, 2019</p>
Certification Statement [(b)(1)(iv)]	See Attachment A

2.0 WELL INFORMATION

2.1 REESE HOLLOW 115-1HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
<i>or</i>	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

2.2 REESE HOLLOW 115-2HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
or	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

2.3 REESE HOLLOW 115-3HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B

2.3 REESE HOLLOW 115-3HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
<i>or</i>	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

2.4 REESE HOLLOW 115-4HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
<i>or</i>	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable

2.4 REESE HOLLOW 115-4HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

2.5 REESE HOLLOW 115-5HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
<i>or</i>	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

2.6 REESE HOLLOW 115-6HU [40 CFR 60.5420a(b)(2)]	
Requirement	Response
<ul style="list-style-type: none"> Records identifying each well completion operation for each well affected facility. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a. [(b)(2)(i) and (ii)] 	Not Applicable. There were no deviations associated with well completion utilizing hydraulic fracturing from the standards of 60.5375a during the Reporting Period.
<ul style="list-style-type: none"> Log of each well completion operation. [(b)(2)(i)] 	See Attachment B
<ul style="list-style-type: none"> Records if claiming Exception under 60.5375a(a)(3) – unable to route to a completion combustion device. [(b)(2)(i)] 	See Attachment B
<i>or</i>	
<ul style="list-style-type: none"> If using Digital Photograph in lieu of the records required in 60.5420a(c)(1)(i)-(iv), retain records specified in 60.5410a(a)(4) [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records if the Well is not subject to the Well Completion Standards according to 60.5375a(g) – Facility with less than 300 scf of gas per stock tank barrel of oil produced. [(b)(2)(i)] 	Not Applicable
<ul style="list-style-type: none"> Records that support a low pressure well determination including supporting inputs and calculations. [(b)(2)(iii)] 	Not Applicable

3.0 CENTRIFUGAL COMPRESSOR [40 CFR 60.5420a(b)(3)]	
Requirement	Response
	Not Applicable. No centrifugal compressors are located at this site.

4.0 RECIPROCATING COMPRESSOR [40 CFR 60.5420a(b)(4)]	
Requirement	Response
	Not Applicable. No reciprocating compressors are located at this site.

5.0 PNEUMATIC CONTROLLER

[40 CFR 60.5420a(b)(5)]

Requirement	Response
	Not Applicable. No applicable pneumatic controllers are located at this site.

6.0 STORAGE VESSEL

[40 CFR 60.5420a(b)(6)]

Requirement	Response
	Not Applicable. No applicable storage vessels are located at this site.

7.0 FUGITIVE EMISSIONS COMPONENTS

7.1 SURVEY 1

[40 CFR 60.5420a(b)(7)]

Requirement	Response
• Date of Survey [(b)(7)(i)]	June 21, 2018
• Time of Survey [(b)(7)(ii)] ○ Start Time ○ End Time	7:02 am 8:15 am
• Name of operator(s) performing survey. If using OGI, note the training and experience of the operator. [(b)(7)(iii)]	Ryan Flanagan: Certified OGI Thermographer through June 15, 2022, by Infrared Training Center with five years of LDAR experience.
• Ambient temperature, sky conditions, and maximum wind speed [(b)(7)(iv)]	62°F; overcast skies; 1.4 mph winds
• Monitoring instrument [(b)(7)(v)]	FLIR Infrared Camera Model GF320
• Any deviations from the monitoring plan [(b)(7)(vi)]	No
• Number and type of components where fugitive emissions were detected [(b)(7)(vii)]	(2) Two Relief Valves at GPUs (1) One Screw Connector at GPU
• Number and type of components that were not repaired [(b)(7)(viii)]	(0) Zero
• Number and type of difficult-to-monitor and unsafe-to-monitor components monitored [(b)(7)(ix)]	(0) Zero
• Date of successful repair of components [(b)(7)(x)]	June 21, 2018
• Number and type of components placed on delay of repair and explanation for delay [(b)(7)(xi)]	(0) Zero

7.1 SURVEY 1*[40 CFR 60.5420a(b)(7)]*

Requirement	Response
<ul style="list-style-type: none">Type of instrument used to resurvey repaired components that could not be repaired during initial finding [(b)(7)(xii)]	Not Applicable

7.2 SURVEY 2*[40 CFR 60.5420a(b)(7)]*

Requirement	Response
<ul style="list-style-type: none">Date of Survey [(b)(7)(i)]	November 5, 2018
<ul style="list-style-type: none">Time of Survey [(b)(7)(ii)]<ul style="list-style-type: none">Start TimeEnd Time	11:35 am 12:28 pm
<ul style="list-style-type: none">Name of operator(s) performing survey. If using OGI, note the training and experience of the operator. [(b)(7)(iii)]	Ryan Flanagan: Certified OGI Thermographer through June 15, 2022, by Infrared Training Center with five years of LDAR experience.
<ul style="list-style-type: none">Ambient temperature, sky conditions, and maximum wind speed [(b)(7)(iv)]	45.7°F; overcast skies; 7.4 mph winds
<ul style="list-style-type: none">Monitoring instrument [(b)(7)(v)]	FLIR Infrared Camera Model GF320
<ul style="list-style-type: none">Any deviations from the monitoring plan [(b)(7)(vi)]	No
<ul style="list-style-type: none">Number and type of components where fugitive emissions were detected [(b)(7)(vii)]	(0) Zero
<ul style="list-style-type: none">Number and type of components that were not repaired [(b)(7)(viii)]	Not Applicable
<ul style="list-style-type: none">Number and type of difficult-to-monitor and unsafe-to-monitor components monitored [(b)(7)(ix)]	(0) Zero
<ul style="list-style-type: none">Date of successful repair of components [(b)(7)(x)]	Not Applicable
<ul style="list-style-type: none">Number and type of components placed on delay of repair and explanation for delay [(b)(7)(xi)]	Not Applicable
<ul style="list-style-type: none">Type of instrument used to resurvey repaired components that could not be repaired during initial finding [(b)(7)(xii)]	Not Applicable

7.3 SURVEY 3 [40 CFR 60.5420a(b)(7)]	
Requirement	Response
• Date of Survey [(b)(7)(i)]	April 10, 2019
• Time of Survey [(b)(7)(ii)] ○ Start Time ○ End Time	1:55 pm 4:06 pm
• Name of operator(s) performing survey. If using OGI, note the training and experience of the operator. [(b)(7)(iii)]	Eric Feltner: Certified OGI Thermographer through January 25, 2023, by Infrared Training Center with one year of LDAR experience. Bryan Hazelwood: Certified OGI Thermographer through January 25, 2023, by Infrared Training Center with one year of LDAR experience.
• Ambient temperature, sky conditions, and maximum wind speed [(b)(7)(iv)]	38°F; cloudy skies; 10 knots winds
• Monitoring instrument [(b)(7)(v)]	Manufacturer ICI; Model: HC Mirage; Serial: 218
• Any deviations from the monitoring plan [(b)(7)(vi)]	No
• Number and type of components where fugitive emissions were detected [(b)(7)(vii)]	(0) Zero
• Number and type of components that were not repaired [(b)(7)(viii)]	Not Applicable
• Number and type of difficult-to-monitor and unsafe-to-monitor components monitored [(b)(7)(ix)]	(0) Zero
• Date of successful repair of components [(b)(7)(x)]	Not Applicable
• Number and type of components placed on delay of repair and explanation for delay [(b)(7)(xi)]	Not Applicable
• Type of instrument used to resurvey repaired components that could not be repaired during initial finding [(b)(7)(xii)]	Not Applicable

8.0 PNEUMATIC PUMP [40 CFR 60.5420a(b)(8)]	
Requirement	Response
	Not Applicable. No applicable pneumatic pumps are located at this site.

9.0 CLOSED VENT SYSTEM CERTIFICATION <i>[40 CFR 60.5420a(b)(12)]</i>	
Requirement	Response
	Not Applicable. No closed vent systems are located at this site.